

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,

PLAINTIFF,

VS.

ALICE DURKALSKI,

DEFENDANT.

CRIMINAL NO.: 00-158

TYPE OF PLEADING:

APPLICATION FOR EARLY TERMINATION OF TERM OF SUPERVISED RELEASE

FILED ON BEHALF OF:

ALICE DURKALSKI

DEFENDANT

ATTORNEY OF RECORD:

ADAM B. COGAN, ESQUIRE

PA I.D. NO.: 75654

ONE NORTHGATE SQUARE

GREENSBURG, PA 15601

[724] 837-9046

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,)	
)	
PLAINTIFF,)	
)	
VS.)	CRIMINAL NO.: 00-158
)	
ALICE DURKALSKI,)	
)	
DEFENDANT.)	
)	

**APPLICATION FOR EARLY TERMINATION OF TERM OF SUPERVISED
RELEASE**

AND NOW, comes the Defendant, ALICE DURKALSKI, by counsel, ADAM B. COGAN, ESQUIRE, and respectfully requests that this Honorable Court terminate the Defendant's term of supervised release previously imposed pursuant to the authority vested in this Court under Title 18, United States Code, Section 3583 (e) and Rule 32.1(b) of the Federal Rules of Criminal Procedure. In support thereof, the Defendant respectfully avers as follows:

1. On September 27, 2001, this Honorable Court sentenced the Defendant [hereinafter Durkalski] to a term of 37 months incarceration and a period of 5 years of supervised release after her guilty plea at an indictment charging her with conspiracy to distribute and possession with intent to distribute in excess of 500 grams of cocaine.

2. Durkalski served her term of incarceration at FPC Alderson and FPC Bryan. On or about June 2, 2003, Durkalski was released from incarceration. While still incarcerated, Durkalski's behavior was so exemplary

that she was permitted to work outside the institution during her period of incarceration.

3. On December 2, 2003, Durkalski was released from her six month stay at a halfway house. All told, Durkalski has serviced in excess of 21 months of her 60 month term of supervised release without incident.

4. Durkalski is now a 55 year old grandmother and Durkalski's adjustment since her release from incarceration has been nothing short of exemplary. Since Durkalski's release from incarceration, Durkalski has been working full time for Interstate Brands Companies. Indeed, Durkalski's employer has prepared a letter detailing Durkalski's extraordinary contribution to the business. See the attached Exhibit A.

5. In addition to working full time, Durkalski has assisted in caring for her elderly mother and plans for her mother to move in with her in the near future to better care for her needs.¹

6. Through her successful completion of the Bureau of Prisons substance abuse treatment program, Durkalski has successfully dealt with her substance abuse problems which contributed to her commission of this offense.

7. Although Durkalski has adapted to life upon her release from incarceration despite her supervised release, her continued supervision means that she is constantly having to relive a time in her life which she has taken enormous strides to put behind her. As of the date of this application,

¹ Durkalski's daughter, son in law and granddaughter also reside with her.

approximately 10 years will have passed since Durkalski committed the acts which gave rise to her charges.

8. It is believed and therefore averred that Durkalski's probation officer, Senior U.S. Probation Officer John Kuklar, fully supports the early termination of Durkalski's supervised release.

WHEREFORE, it is respectfully requested that this Honorable Court terminate Durkalski's period of supervised release.

RESPECTFULLY REQUESTED,

s/Adam B. Cogan,
ADAM B. COGAN, ESQUIRE
PA I.D. NO.: 75654

ATTORNEY FOR THE DEFENDANT